

# ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Renewal of Experimental Classification and ) Docket No. MC99-1  
Fees for Weight-Averaged Nonletter-Size )  
Business Reply Mail )

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS JAMES M. KIEFER  
(OCA/USPS-T1-1-7)  
March 26, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses to these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets,



charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such printouts, microfilms, cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is

possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

A handwritten signature in dark ink, appearing to read "Ted P. Geraden", is written over a horizontal line.

Ted P. Geraden  
Director

Kenneth E. Richardson  
Attorney

OCA/USPS-T1-1. Please refer to the errors and problems enumerated in your testimony at page 5. Will the Y2K moratorium imposed in the memorandum of March 9, 1999 by the Year 2000 Executive Council (see Exhibit USPS-RT-1A, attached to witness Garvey's prepared testimony in Docket No. MC98-1, filed March 22, 1999) have any effect on implementing "national postal network," which you refer to on page 6 of your testimony, as a potential solution to these problems? Please explain.

OCA/USPS-T1-2. On page 6 of your testimony, you indicate that "Implement[ation] of a network-based solution will require significant rewriting of the software. . . ." Also, you state that the rewritten software for a national network would need to be thoroughly tested for reliability and compatibility with existing network software.

- a. Please give your best estimate on the amount of time which would be required for this rewriting and testing?
- b. If the above referenced Y2K moratorium applies through March, 2000, it appears that the networking, software development and testing could not be accomplished by the end of the extended experiment, February 29, 2000. Please explain why an extension to February 29 is requested in view of the moratorium.

OCA/USPS-T1-3. Please refer to page 6 of your testimony. If the current local PC-based system is maintained, you state "it still would be necessary to revise the hardware and software to allow remote access and off-site troubleshooting by the system administrator."

- a. Can this be accomplished while the Y2K moratorium is in effect? Please explain.
- b. Would an exception to the moratorium need to be obtained to complete this work during the proposed extended experimental phase? If so, do you expect that it would be given?

OCA/USPS-T1-4. On page 8 of your testimony, you state "we do not anticipate needing that much time [until February 29, 2000] to be ready to implement the

permanent classification and fees.” What is the currently anticipated minimum amount of time needed?

OCA/USPS-T1-5. If the experiment terminates on June 7, 1999 and the four postal facilities revert to charging the 8 cent per piece accounting fee for mail currently subject to the experimental BRM rates, please estimate the total dollar impact on the customers in the experiment:

- a. on a monthly or accounting period basis;
- b. between June 7, 1999 and February 29, 2000?


OCA/USPS-T1-6. If the rates charged under the renewed experiment were changed to the rates proposed in Docket No. MC99-2 on June 8, 1999, please estimate the total revenue impact on the customers currently in the experiment:

- a. on a monthly or accounting period basis;
- b. between June 7, 1999 and February 29, 2000?

OCA/USPS-T1-7. On page 10 of your testimony you state witness Schenk’s cost estimates in her testimony filed in Docket No. MC99-2 (USPS-T-3) indicate “the current experimental accounting fees more than cover the Postal Service’s costs of counting, rating and billing for this BRM.” Would the costs of counting, rating and billing for weight-averaged nonletter-sized BRM be covered during the extended experimental phase if the fees charged were those proposed in Docket No. MC99-2?

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink, appearing to read "Kenneth E. Richardson", written in a cursive style.

KENNETH E. RICHARDSON  
Attorney

Washington, D.C. 20268-0001  
March 26, 1999